

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

This Document Pertains to
Member Case C-17-0559-PHX-DGC
Danus Bryson Chrisley

**PLAINTIFFS' NOTICE OF FILING
AMENDED PLEADING BY
WRITTEN CONSENT**

COMES NOW Plaintiff Danus Bryson Chrisley and gives notice of filing an Amended Complaint by written consent of opposing counsel, to include the spousal/consortium claim of his wife, Patricia McLellan Chrisley. A copy of the amended pleading is filed concurrently with this Notice as Exhibit A, reflecting this change by a bold underline at numbered paragraphs 2 and 12. Other than the addition of Patricia McLellan Chrisley's spousal/consortium claim, no changes or amendments have been made to Plaintiff's Complaint.

Respectfully submitted,

THE NATIONS LAW FIRM

/s/ Howard L. Nations
Howard L. Nations
Texas Bar No. 14823000
3131 Briarpark Dr.
Suite 208
Houston, TX 77042

ATTORNEYS FOR PLAINTIFF(S)

1 **CERTIFICATE OF WRITTEN CONSENT OF OPPOSING COUNSEL**

2 I hereby certify, under the laws of perjury of the State of Texas, that Charles Bailey, a
3 paralegal in my office, requested written consent of opposing counsel prior to filing Plaintiff Danus
4 Bryson Chrisley and Patricia McLellan Chrisley's Amended Complaint, and received such written
5 consent from Sanjay Ghosh of Nelson Mullins LLP, counsel for Defendants, via email on May 9,
6 2017.

7 _____
8 /s/ Howard L. Nations
9 Howard L. Nations

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on this 9th day of May, 2017, I electronically transmitted the attached
12 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of
13 Electronic Filing.

14 _____
15 /s/ Howard L. Nations
16 Howard L. Nations